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BY ECF AND EMAIL

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: In re Tether and Bitfinex Crypto Asset Litigation, No. 19 Civ. 9236 (S.D.N.Y.)

Dear Judge Failla:

We write on behalf of Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether International Limited, Ludovicus Jan van der Velde, and Giancarlo Devasini (the "B/T Defendants") to respectfully seek leave to serve an interrogatory on Plaintiffs, pursuant to Local Rule 33.3(b) and Paragraph 6(c) of the Court's Scheduling Order (Dkt. No. 298).

The B/T Defendants propose to serve an interrogatory requesting that Plaintiffs identify the wallets they owned or controlled from February 17, 2015 through June 5, 2020 by providing the wallet addresses and/or other identifying account information for their crypto holdings and transactions. The B/T Defendants and the Plaintiffs have conferred and exchanged a series of letters, and the B/T Defendants understand that Plaintiffs will not oppose this motion. (Dkt. No. 307 at 3).

An interrogatory is a superior way to seek discovery of wallet addresses – which consist of a long string of letters and numbers – and similar information, as opposed to a request for production of documents or a deposition. *See* Local Civil Rule 33.3(b)(1) (permitting service of interrogatories "if they are a more practical method of obtaining the information sought than a request for production or a deposition"); *In re Weatherford Int'l Secs. Litig.*, 2013 WL 5788680, at *3 (S.D.N.Y. Oct. 28, 2013) (authorizing interrogatories seeking "discrete" information that would "entail comparatively simple responses rather than long narrative explanations").

The B/T Defendants therefore seek leave to serve the interrogatory attached as Exhibit 1.

Respectfully submitted,

/s/ Elliot Greenfield